

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE

Winnemucca District / Humboldt River Field Office

TRACKING NUMBER: **DOI-BLM-NV-W010-2014-0012-DNA**

CASEFILE/PROJECT NUMBER: JB39

PROPOSED ACTION TITLE/TYPE

Unionville Wildland-Urban Interface Fuels Project

LOCATION/LEGAL DESCRIPTION

Unionville is located in Pershing County and lies within an east-facing canyon in the Humboldt Range. Legal description is Township 30 N, Range 34 E, Secs 22, 23, 26, and 27 of the Mount Diablo Meridian.

APPLICANT (if any): Bureau of Land Management (BLM)

A. Description of the Proposed Action with attached map(s) and any applicable resource protection measures

Background

The community of Unionville is a federally designated community-at-risk because of its proximity to federal wildlands: 1) in which conditions are conducive to broad-scale wildland fires and 2) for which a significant threat to human life or property exists as a result of a wildland fire event (Healthy Forest Restoration Act of 2003). Further, the community of Unionville has been identified as a community in the “extreme hazard” category based on the Nevada Fire Safe Council Risk Assessment (June 2004). At least two large fires (i.e., Dun Glen Complex, Peru Fire), which started in wildland areas, have burned into the community resulting in emergency evacuations of residents. Additionally, several other smaller fires have occurred in close proximity to the community. The Healthy Forest Restoration Act of 2003 mandates the BLM to protect communities from the threat of wildland fire.

In 2007, a fuelbreak was authorized and constructed on the north side of the community along an existing dozer line. This dozer line was laid down during fire suppression operations on the Dun Glen Complex Fire in 1999. The fuelbreak was 50 feet wide and

approximately 3.4 miles long and is 10 acres in dimension. It occurs along both public and private land where an agreement with the land owner was obtained.

Proposed Action

The BLM fuels program is proposing to expand the wildland-urban interface fuelbreak system around the community of Unionville. The proposed expansion would double the width of the existing fuelbreak on the north side of the community from 50 to 100 feet and construct a fuelbreak on the south side of the community as well (see map). The expansion of the north-side fuelbreak would increase the acreage from 10 to 20.5 acres. The fuelbreak along the south side of the community would also be 100 feet wide. It would extend approximately 3.5 miles in length and occupy 20.6 acres. These proposed fuelbreaks are similar in location and type to those analyzed in the environmental assessment (i.e., Winnemucca Wildland-Urban Interface Greenstrip, Decision 21 September 2006) and portions have been previously treated.

Summary Proposed Fuelbreaks

North-Side Fuelbreak – Current Treatment 3.4 miles in length, 50 feet wide, 10 acres
Proposed Treatment 3.4 miles in length, 100 feet wide, 20.5
acres

South-Side Fuelbreak – Proposed Treatment 3.5 miles in length, 100 feet wide, 20.6 acres

Total 41.3 acres

Most of the proposed treatment area is covered with grass and other herbaceous plants. However, some areas have sagebrush cover which would need to be removed. The brush would be removed by hand (e.g., chainsaw, Pulaski, etc.). Grass growing within the fuelbreak, either native perennials or non-native annuals, would be cut using weed-eaters or an ATV and mower. Maintenance would occur on an annual basis after major vegetative growth occurs in late spring or early summer (e.g., late May or early June). For use of any non-federal work force, a BLM project inspector would be required to inspect work and a wildlife biologist or their approved representative would be required to survey for migratory bird nests prior to or during construction or maintenance activities (see Resource Protection Measures for complete explanation).

Treatments on Private Lands: Portions of the fuelbreak on the north side of the community include private lands. We currently have agreements in place with these land owners. New agreements might be needed or amended prior to any new implementation. The east end of the south-side fuelbreak anchors to a road on private lands. If land owner approval could be obtained, additional treatment along both sides of the existing road would be an optional treatment. Treatments along the road would extend 10-20 feet on both sides of the road. The road is approximate 0.3 miles long; thus, the amount of additional disturbed area would not exceed 3 acres. The proposed project is supported by

the Wyden Amendment (Public Law 109-54 and Public Law 111-11) which allows the BLM to enter cooperative agreements with Federal, Tribal, State, and local governments as well as private landowners and non-profit entities for projects on public or private lands that reduce risk from natural disaster where public safety is threatened and that also benefit resources on public lands.

Greater Sage-Grouse Considerations: The proposed south-side fuelbreak intersects modeled greater sage-grouse preliminary general habitat (PGH) on its west end. Approximately 1.6 acres of PGH would be impacted. The area of PGH to be disturbed is within close proximity to a residence in Unionville. Behavioral studies of greater sage-grouse indicate that birds avoid developed areas including homes and other infrastructure (Hanser et al. 2011, Johnson et al. 2011).

Other Wildlife Considerations: The east sides of both fuelbreaks are located in year-round pronghorn antelope habitat. Also, the west sides of both fuelbreaks are located within crucial summer and the east sides are located within crucial winter habitat for mule deer. Both fuelbreaks are located within potential bighorn habitat; there are no areas currently occupied by bighorn. The potential use by wildlife for these areas is low as they have been previously disturbed (e.g., wildfire and mining) and are located adjacent to human development.

Raptor nests have been previously identified in the aspen grove west of the South-side fuelbreak. If raptor nests are found, construction of the fuelbreak will be conducted according the spatial and temporal guidance of the Utah State Office, Fish and Wildlife Service Guidelines (Romin & Muck 2002).

Bats have been identified in the area during wildlife surveys and have been noted to use adits and other mine structures for roosting. The fuelbreak will not impact any mine features that may be utilized by bats.

Resource Protection Measures

Design features from the EA and applicable to all proposed actions and additional measures.

1. All treatments identified would be in accordance with the Instruction Memorandums WO-IM-2012-043 Greater Sage-Grouse Interim Management Policies and Procedures and WO-IM-2010-149 Sage-grouse Conservation Related to Wildland Fire and Fuels Management. Fuels Management Best Management Practices (BMPs) for Sage-Grouse Conservation.
2. During any new fuelbreak construction activities that are not performed outside of the migratory bird breeding season (March 1 – August 31), a migratory bird nesting survey would be conducted by a wildlife biologist or their approved representative in potential habitat areas no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests are located, a minimum 260

ft. protective buffer would be established or activities delayed until the birds have completed nesting and brood-rearing activities. Once the fuelbreak has been established and for activities during the migratory bird breeding season, work by federal hand crews would not require a survey by a biologist. However, federal crews would be required to visually inspect the project area for any nests as they work and a buffer would be implemented around the nest if found. For any maintenance activities that utilize mechanized equipment, a migratory bird nesting survey would be conducted in potential habitat areas no more than 10 days and no less than 3 days prior to initiation of disturbance.

3. In accordance with state law, noxious weeds would be treated upon discovery. Survey and control of noxious weeds would occur during maintenance activities for fuelbreaks. Weed locations would be reported to invasive weeds specialist.
4. A minimum 10-foot buffer would be implemented around springs and other perennial water sources (see Map). Brush and grass would not be removed in these areas.
5. All historic properties (i.e., archaeological sites listed unevaluated or eligible for inclusion on the National Register of Historic Places) would be avoided during project implementation. Avoidance buffers of at least 30 meters from National Register sites would be observed during project implementation.
6. Any unanticipated archeological discovery on BLM lands will be reported to a BLM archeologist and work in the immediate vicinity will stop until the archeologist is consulted.
7. If any significant paleontological resources are found during operations, impacts would be mitigated through avoidance and/or data recovery. Any unanticipated vertebrate fossil discovery on BLM lands will be reported immediately to the Project Archaeologist.

B. Land Use Plan (LUP) Conformance

LUP Name* Paradise-Denio Management Framework Date Approved July 1982

Other document _____ Date Approved _____

Other document _____ Date Approved _____

*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)

The proposed action described is in conformance with the Paradise-Denio Management Framework Plan III (MFP) July 1982. Although not specifically addressed, the proposed treatments conform to fire and management decisions, or standard operating procedures.

Fire F-1 Objective:

“To minimize the wildfire damage to life, property, and resources.”

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name, number and date (DR/FONSI or ROD) all applicable NEPA documents that cover the proposed action.

1. Name: Winnemucca Wildland-Urban Interface Area Treatment Project EA
NEPA ID: DOI-BLM-NV-WO10-2010-0011-EA
Date: September 2010
FONSI: 20 September 2010
2. Name: Montana Mountains Cooperative Fuels Treatment Project EA
NEPA ID: DOI-BLM-NV-WO10-2011-0005-EA
Date: July 2012
FONSI: 2 August 2012

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Hanser, Steven E.; Aldridge, Cameron L.; Leu, Matthias; Rowland, Mary M.; Nielsen, Scott E.; Knick, Steven T. 2011. Greater sage-grouse: general use and roost site occurrence with pellet counts as a measure of relative abundance. In: Hanser, S.E.; Leu, M.; Knick, S.T.; Aldridge, Cameron L., eds. Sagebrush ecosystem conservation and management: ecoregional assessment tools and models for the Wyoming Basins. Lawrence, KS: Allen Press: 112-140. Chapter 5.

Johnson, D.H.; Holloran, M.J.; Connelly, John W.; Hanser, Steven E.; Amundson, Courtney L.; Knick, Steven T. 2011. Influences of environmental and anthropogenic features on Greater sage-grouse populations, 1997-2007. In: Knick, S.T.; Connelly, J.W., eds. Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats. Studies in Avian Biology (vol. 38), University of California Press, Berkeley, CA. Pp. 407-450. Chapter 17.

Romin, Laura A.; Muck, James A. 2002. Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances. U.S. Fish and Wildlife Service, Utah Field Office, Salt Lake City.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes, the proposed actions are essentially similar to those of the existing NEPA document. Both actions call for the construction and maintenance of fuelbreaks to protect communities from unwanted wildfire.

This project is not within the same analysis area as the existing NEPA document. However, this project occurs in an area with similar conditions as those analyzed in the existing NEPA documents. More specifically, this project occurs in Wyoming big sagebrush habitat in areas of high fire-danger.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, the range of alternatives analyzed in the existing NEPA document is appropriate. The environmental concerns, interests and resource values have not changed and are not significantly different.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, the existing analysis is still valid. No new reports or species updates would impact this proposal. There is no new information or circumstance that would impact the analysis of the new proposed action. The instruction memorandum (IM-2011-138) for greater sage-grouse management for fuels treatments for the referenced NEPA documents is compatible with IM-2012-044, the current guidance for sage-grouse management. The list of sensitive species for Nevada has not changed since the analysis of the reference NEPA documents.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, all of the impacts of the proposed actions are similar to those already analyzed in the existing EA.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. There was adequate public involvement in the original NEPA documents to cover this evaluation. An interested party letter was sent out in March of 2006 informing known interested parties that the BLM was proposing to implement a wildland-urban interface fuelbreak. Additionally, an information bulletin was broadcast on radio stations in the area and an article was published in the local newspaper. Two comments were received and incorporated into the document.

Another interested party letter was sent out in July of 2006 informing known interested parties that the BLM had completed the preliminary EA and the document was available for review. A similar notification was made by local radio stations and the newspaper. Several comments were received and incorporated into the document as appropriate. All comments were in favor of the project. Adequate Native American Consultation was conducted during the development of the EA. The Winnemucca Indian Colony made no comments. No further consultation is required as the project is located on the wildland-urban interface outside of traditional-use areas and is being implemented for public safety.

In addition to the scoping performed for the original EA, two town hall meetings were held in Unionville for the proposed fuelbreaks, on 5 December 2013 and on 5 March 2014. Most public comments at these meetings were supportive of the proposed action as stated in the proposed action. An alternative location for the south-side fuelbreak was discussed during the March meeting. The alternative suggested would have the fuelbreak run along the first ridgeline south of the community and then down the ridgeline into Wilson Canyon. The ridgeline location was suggested to be a better location for suppression resources to engage and suppress potential wildfires. This suggestion was considered by the interdisciplinary team both in the office and during a site visit on the 10 March 2014. The alternative was considered but eliminated due to the following reasons:

- 1) The ridgeline had steep slopes both on the north (into the community) and to the south (into Peru Canyon). Thus, fire would be moving onto the ridgeline in a moving head fire with high fire-intensity. Fire managers determined that this position would be less safe for fire suppression personnel and less defensible for the community.
- 2) The amount of unburned fuel between the community and the location of the fuelbreak would increase. Since homes and other structures are situated along the canyon floor in a linear fashion for several miles, the area of potential fire spread due to spotting or other factors could easily overwhelm even a moderately-sized fire suppression force.
- 3) The ridgeline location, contrary to our expectation, was less accessible to engines and crews than the original proposed location. Therefore, fire suppression operations would be more and not less difficult. This was verified only after a site visit.

4) Approximately four times the amount of greater sage-grouse habitat would be disturbed by construction and maintenance of the alternative versus the proposed fuelbreak location. Also, the alternative location would impact raptor nests and roosting locations for bats that are not impacted by the proposed location.

DOI-BLM-NV-W010-2013-0041-DNA

E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Mark Williams	Fire Management/Fuels	/s/ Mark Williams 14 March14	
Patrick Haynal	Cultural	/s/ Patrick Haynal	None
Mark Williams	Native American Consultation	/s/ Mark Williams 14 March 14	
Tom Goodell	Rangeland Management	/s/ Tom Goodell	No impact for range
Debbie Dunham	Realty	/s/ Debbie Dunham 3/14/14	
Joey Carmosino	Visual Resource Management	/s/ VJ Carmosino 03/05/2014	VRM Class IV
Eric Baxter	Weeds	/s/ Eric Baxter 03/05/2014	Manage for weeds in future
Rob Burton	Air Quality/ Soils/Vegetation	/s/ Rob Burton 3/14/2014	
John McCann	Hydrology/Wetlands	/s/ John McCann 03/10/2014	
Nancy Spencer-Morris	T&E/Wildlife	/s/ Nancy Spencer-Morris	None
Allison Brandt	GIS	/s/ Allie Brandt	Make sure to have me verify final maps
Zwaantje Rorex	Lands with Wilderness Characteristics	/s/ Zwaantje Rorex 3/13/14	
Mark Hall	NEPA Coordinator	/s/ Mark E Hall 4/2/14	

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

☒ **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

/s/ Mark Williams
Signature of Project Lead

/s/ Mark E Hall
Signature of NEPA Coordinator

/s/ Vic Lozano
Signature of the Responsible Official

4/2/14
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.